REMARKS

Claims 1-7 and 9-10 are currently pending in the present application. In the Office

Action, the Examiner rejected the Claims as follows. Claims 1 and 6-7 were rejected under 35

U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,944,150 (McConnell). Claims 9-10

were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,580,699

(Manning). Claims 2-5 were rejected under 35 U.S.C. §103(a) as being unpatentable over

McConnell in view of U.S. Patent No. 5,771,275 (Brunner).

Regarding the Examiner's rejection of independent Claim 1, the Examiner states that

McConnell teaches each and every limitation of Claim 1. More specifically, the Examiner states

that McConnell teaches a mediation gateway connected to the RAN (Radio Access Network), for

performing an IP (Internet Protocol) registration for the circuit network terminal, as recited in

Claim 1. After reviewing McConnell, it is respectfully submitted that the Examiner is incorrect.

First, the mediation gateway of the present application, as recited in the Claims, generally

performs two functions i.e., mobility management and IP registration of the circuit network

terminal. However, as taught by McConnell, the gateway merely provides a function of

converting traffic transmitted/received among a wireless communication system including a

registered mobile station, a packet network and a PSTN (Trunk Gateway) into traffic suitable for

the corresponding network (system).

The gateway, as taught by McConnell, is different from the mediation gateway recited in

recited in the Claims of the present application, in that the gateway of the present application, as defined by the Claims, allows the circuit network terminal to be recognized as a packet network terminal in the packet-based network. In contrast, as taught by McConnell, the gateway only performs a function for converting a data traffic type.

In other words, as taught by McConnell, the gateway only performs an interface function between an IP network and an RNC (Radio Network Controller) and a communication assistance function, whereas, the mediation gateway of the present application performs functions such as a conversion of signals suitable for a function of authorizing and billing for the circuit network terminal over the packet-based network as well as an SIP (Session Initiated Protocol) registration, arrangement, and call setup. This means that the gateway, as taught by McConnell, performs only a lower layer function by performing as an interface/path, whereas, the mediation gateway of the present application, as recited by the Claims, performs an upper application layer function as well as lower layer function such as authorization and billing.

In summation, McConnell teaches providing services in a communications network. More specifically, although McConnell teaches a wireless access gateway (WAG) for communicating with a packet switched network, McConnell teaches the WAG functions to convert between signals suitable for communication with a wireless communication system and signals suitable for communication with a packet network (e.g., see, Column 8, Lines 5-20), McConnell does not teach or suggest a mediation gateway connected to the RAN, for performing an IP registration for the circuit network terminal, as recited in Claim 1.

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Accordingly, as McConnell does not teach or suggest each and every limitation of Claim 1, it is respectfully requested that the rejection under 35 U.S.C. §102(e) of Claim 1 be withdrawn.

Regarding the rejection of independent Claim 9, the Examiner states that Manning teaches each and every limitation of Claim 9. After reviewing Manning, it is respectfully submitted that the Examiner is incorrect.

Manning teaches a system and a method for renewing an "R-P" connection for roaming of a mobile station, wherein an R-P connection is maintained or established after the mobile station roams from the control of an old BSC (Base Station Controller) to that of a new BSC.

More specifically, Manning teaches minimizing packet loss by maintaining or establishing (in a timely manner) an R-P connection when a PDNS (Packet Data Serving Node) is incapable of forwarding a packet because of secession of the mobile station from a first radio network coverage area connected to PDSN according to movement of the mobile station from the first radio network to a second radio network. In this manner, Manning teaches when the mobile station is located in the first radio network, packet data session information including information about the first R-P connection and its associated PDSN is stored and thereafter transferred to a BSC of the second radio network when the mobile station moves into the second radio network's coverage area.

In summation, Manning teaches a system and a method for establishing an R-P connection after a mobile station (MS) roams from the control of an old base station controller

(BSC) to that of a new BSC. In other words, Manning teaches a system and a method for establishing R-P connections when roaming between BSCs. With reference to FIGs. 3-10, Manning teaches switching procedures and transmitting user data packets between an MS and a PDSN ((packet data serving node), e.g., see, Step 112, FIG. 6; Steps 140, FIG. 7; Steps 180, FIG. 8; and Steps 218 and 220, FIG. 9). However, in contrast with that which is taught by Manning, Claim 9 includes the recitation of a circuit network terminal supporting communication over a circuit-based network. In other words, the circuit network terminal transmits data using a circuit-based system as opposed to an IP-based packet data transmission which is used by the terminals taught by Manning (e.g., see, Steps 218 and 220 in FIG. 9 of Manning).

In contrast with that which is taught by Manning, Claim 9 includes the recitation of a circuit network terminal supporting communication over a circuit-based network, and receiving a packet voice call origination request at a mediation gateway from the circuit network terminal through a radio access network (RAN) via a circuit-based network interface, which is neither taught nor suggested by Manning. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. §102(e) of Claim 9 be withdrawn.

Regarding the Examiner's rejection of independent Claim 10, Claim 10 includes similar recitations as those contained in Claim 9. Moreover, Claim 10 includes the recitation of paging the circuit network terminal through a radio access network (RAN) via a circuit-based network interface by the mediation gateway, which is neither taught nor suggested by Manning, which is discussed above with respect to the rejection of Claim 9. Accordingly, it is respectfully requested that the under 35 U.S.C. §102(e) of Claim 10 be withdrawn.

independent Claims 1, 9, and 10 are believed to be in condition for allowance. Without conceding the patentability per se of dependent Claims 2-7, these are likewise believed to be allowable by virtue of their dependence on their respective independent claims. Accordingly, reconsideration and withdrawal of the rejections of dependent Claims 2-7 is respectfully requested.

Accordingly, all of the claims pending in the Application, namely, Claims 1-7 and 9-10, are believed to be in condition for allowance. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters, the Examiner may contact Applicant's attorney at the number given below.

Respectfully submitted,

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